

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

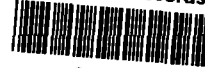
DATE: October 2, 1984

TO: Division File

FROM: M. D. Grant ^{MDG}

SUBJECT: LPC 1190400006 - Madison County - Granite City/Reilly Tar & Chemical Corp.
ILD006278360

EPA Region 5 Records Ctr.



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A Pre-Enforcement Conference was held on September 28, 1984 with representatives of Reilly Tar and Chemical Corporation. Attending this conference were Bill Justin and Larry Pirtle, representing Reilly Tar. Pat McCarthy and Mike Grant were the representatives for the Agency. The topic of this conference was Reilly Tar's failure to achieve two feet of freeboard in their surface impoundment. The freeboard level was observed at less than two feet on our initial ISS inspection, conducted June 26, 1984 and also on our follow-up inspection conducted September 21, 1984. The purpose of this meeting was to institute a compliance program, which would allow Reilly Tar to achieve the required two feet of freeboard in the impoundment, thus resolving all of the violations observed during our June 26, 1984 ISS inspection.

Reilly Tar's proposal was to build up the berms presently existing around the impoundment and to construct a berm on the south side. Presently precipitation run-off from the plant grounds flows down the slope into the impoundment, which is the main cause for the high levels in the impoundment. We agreed with their proposal and also made them aware that the berms must have protective cover. Mr. Justin stated the berms would be protected and this would be addressed in the letter Reilly Tar is to submit to the Agency within ten days outlining the compliance program as agreed upon by Reilly Tar and the Agency.

A scheduled compliance time of 60 days was set and the scheduled compliance date is November 30, 1984. A reinspection of the facility will be necessary to deem whether the violations have been resolved. This reinspection is scheduled for November 30, 1984, however, if we are notified that the program has been completed before then, an earlier inspection may be scheduled.

MDG:jlr

cc: Phil Van Ness
Southern Region File

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